

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OCEAN SEMICONDUCTOR LLC,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,
INC.,

Defendant.

Civil Action No. 6:20-cv-1216-ADA

JURY TRIAL DEMANDED

**DEFENDANT WESTERN DIGITAL TECHNOLOGIES, INC.'S
SECOND SET OF INTERROGATORIES (NOS. 9 TO 12)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Western Digital Technologies, Inc. hereby requests that Plaintiff Ocean Semiconductor LLC provide written responses to these interrogatories within thirty (30) days of service.

Defendant incorporates by reference the definitions and instructions from Defendant Western Digital Technologies, Inc.'s First Set of Interrogatories (Nos. 1 to 8). In addition, "Fullbrite" means Fullbrite Capital Partners, LLC and all of its predecessors and successors, all past and present parents, subsidiaries, and divisions of Fullbrite Capital Partners, LLC, and all past and present directors, officers, employees, agents, and representatives (including consultants and attorneys) of Fullbrite Capital Partners, LLC.

INTERROGATORIES

9. Identify all shareholders, members, directors, or officers of Ocean, and the role of each since Ocean was formed.

10. Identify all facts on which you intend to rely to demonstrate that the corporate veil should not be pierced should the Court award WDT its attorneys' fees and costs in this Action.

11. Identify all facts on which you intend to rely to demonstrate that Ocean is not the

alter ego of Fullbrite should the Court award WDT its attorneys' fees and costs in this Action.

12. For each asserted claim for which You assert infringement under the doctrine of equivalents, identify under the ensnarement doctrine a hypothetical claim that You allege covers the accused process, and describe in detail why each such claim is not invalid over the prior art.

Dated: March 25, 2022

Respectfully submitted,

SHEARMAN & STERLING LLP

By: /s/ L. Kieran Kieckhefer

L. Kieran Kieckhefer (*pro hac vice*)
535 Mission Street, 25th Floor
San Francisco, CA 94105
Telephone: 415.616.1124
Facsimile: 415.616.1199
Kieran.Kieckhefer@Shearman.com

David P. Whittlesey
300 West 6th Street, 22nd Floor
Austin, TX 78701
Telephone: 512.647.1907
Facsimile: 512.857.6602
David.Whittlesey@Shearman.com

Matthew G. Berkowitz (*pro hac vice*)
Patrick Colsher (*pro hac vice*)
Yue (Joy) Wang (*pro hac vice*)
Shearman & Sterling LLP
1460 El Camino Real, 2nd Floor
Menlo Park, CA 94025
Telephone: 650.838.3737
Facsimile: 650.838.5141
Matt.Berkowitz@Shearman.com
Patrick.Colscher@Shearman.com
Joy.Wang@Shearman.com

Ahmed ElDessouki (*pro hac vice*)
Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022
Telephone: 212.848.4908
Facsimile: 646.848.4908
Ahmed.ElDessouki@Shearman.com

*Attorneys for Defendant
Western Digital Techs., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on March 25, 2022, all counsel of record who have appeared in the above-captioned case were served with a copy of the foregoing by email.

/s/ Shiina Akasaka
Shiina Akasaka
Litigation Case Manager